

### Remarks

Claims 1-16 remain pending in this application after entry of this paper. Claims 1-16 stand rejected under 25 U.S.C. 102(e) as being anticipated by Simard et al. (U.S. Pub. No. 2002/0085697 A1). Applicants believe that the invention is patentable.

Claim 1 recites a computer to telephone interface card. The card comprises a plurality of audio data input ports for receiving audio input data from the computer. The card further comprises a mixer and a converter. The mixer has a plurality of inputs in communication with the plurality of audio data input ports, and has an output. The plurality of mixer inputs receives the audio data and the mixer, in real-time, generates a mixed audio output data signal at the mixer output. The converter has an input receiving the mixed audio output data signal, and has an output for connecting to a phone line to generate and provide mixed audio output to the phone line based on the audio input data received at the plurality of audio data input ports.

This application claims the benefit of U.S. Provisional Application No. 60/241,675, filed on October 19, 2000. The application contains a specific reference to the provisional application on the first page of the specification.

The applied reference, Simard, has a filing date of December 29, 2000, and does not appear to have any earlier effective filing date. Accordingly, the Simard reference is not prior art as the reference has a filing date after the filing date of Applicants' patent application. Accordingly, Applicants respectfully request that the Examiner withdraw the rejection, and allow pending claims 1-16.


Regarding Simard, this reference relates to an apparatus and method for packet-based media communications. In general, the reference relates to improving the performance of a voice conference using a packet-based conference bridge. Because Applicants believe that Simard is not prior art, further discussion of the teachings contained therein is not warranted.

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Reconsideration and allowance of this application is respectfully requested.

Respectfully submitted,  
**ELIOT M. CASE ET AL.**

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